

David R. Vance

From: David R. Vance
Sent: Thursday, October 18, 2018 4:36 PM
To: 'Mercier-Dalphon, Isabelle'; Greenspan, David; Kessler, Jeffrey L.; Amoona, Jonathan; Gordon, Ben; 'Nash, Dan'; 'Eisenstein, Stacey'; 'Diaz, Estela'; 'Slavik, Christy'
Cc: Patrick J. Hoban; Stephen S. Zashin
Subject: Johnson/NFLPA - Joint Letter to the court
Attachments: joint letter to court responding to ECF #125 - 10_18_18.pdf; NFLPA Exhibit A.PDF

Group,

The final joint letter is attached, including the NFLPA's requested Exhibit A.

NFLPA, the attached letter includes an exact copy of the the portion Isabelle sent at 4:26 p.m. Additionally, we made no changes to Plaintiff's portion upon receipt of the NFLPA's portion just minutes ago.

Absent objection, we will file the attached today at 5:00 p.m.

Best,
David



David R. Vance
OSBA Certified Specialist
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From: Mercier-Dalphon, Isabelle [<mailto:IMercier@winston.com>]
Sent: Thursday, October 18, 2018 4:26 PM
To: Stephen S. Zashin; Greenspan, David
Cc: Kessler, Jeffrey L.; Amoona, Jonathan; Gordon, Ben; David R. Vance; Patrick J. Hoban
Subject: RE: Johnson/NFLPA

Stephen/David,

See attached the NFLPA's submission, along with Exhibit A cited therein. Please send us Mr. Johnson's submission and confirm that such submission will "go into the letter to Judge Sullivan without edits," as Stephen represented below.

Best,

Isabelle

David R. Vance

From: Mercier-Dalphon, Isabelle <IMercier@winston.com>
Sent: Thursday, October 18, 2018 4:26 PM
To: Stephen S. Zashin; Greenspan, David
Cc: Kessler, Jeffrey L.; Amoona, Jonathan; Gordon, Ben; David R. Vance; Patrick J. Hoban
Subject: RE: Johnson/NFLPA
Attachments: NFLPA Portion of Joint Submission Due 10-18-18 -- FINAL.DOCX; NFLPA Exhibit A.PDF

Stephen/David,

See attached the NFLPA's submission, along with Exhibit A cited therein. Please send us Mr. Johnson's submission and confirm that such submission will "go into the letter to Judge Sullivan without edits," as Stephen represented below.

Best,

Isabelle

From: Stephen S. Zashin <ssz@zrlaw.com>
Sent: Thursday, October 18, 2018 12:09 PM
To: Mercier-Dalphon, Isabelle <IMercier@winston.com>; Greenspan, David <DGreenspan@winston.com>
Cc: Kessler, Jeffrey L. <JKessler@winston.com>; Amoona, Jonathan <JAmoona@winston.com>; Gordon, Ben <BGordon@winston.com>; David R. Vance <drv@zrlaw.com>; Patrick J. Hoban <pjh@zrlaw.com>
Subject: RE: Johnson/NFLPA

Isabelle:

We have no issue doing a simultaneous exchange of positions. We have already shared with the NFLPA our general thoughts as to next steps. At this point, Johnson's position is his position and the NFLPA's position is its position. Once exchanged, these positions should go into the letter to Judge Sullivan without edits. Please confirm what time you will send the NFLPA's submission and we will do likewise. Thereafter, we will drop the NFLPA's position into the letter and file it with the Court. Thanks.

Stephen



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From: Mercier-Dalphon, Isabelle [<mailto:IMercier@winston.com>]
Sent: Thursday, October 18, 2018 11:59 AM
To: Stephen S. Zashin; Greenspan, David
Cc: Kessler, Jeffrey L.; Amoona, Jonathan; Gordon, Ben; David R. Vance; Patrick J. Hoban
Subject: RE: Johnson/NFLPA

Stephen,

We are prepared to send you the NFLPA's insert around noon, but wanted to confirm that, as stated in David's email below, you will simultaneously send us Johnson's insert. We also want to confirm that, after we simultaneously exchange our inserts, both sides have a period of time to adjust their respective inserts based on the other side's submission prior to filing. Let us know if you agree with the foregoing.

Best,

Isabelle

Isabelle Mercier-Dalphon

Winston & Strawn LLP
D: +1 (212) 294-3554
winston.com



From: Stephen S. Zashin <ssz@zrlaw.com>
Sent: Wednesday, October 17, 2018 7:37 PM
To: Greenspan, David <DGreenspan@winston.com>
Cc: Kessler, Jeffrey L. <JKessler@winston.com>; Amoona, Jonathan <JAmoona@winston.com>; Mercier-Dalphon, Isabelle <IMercier@winston.com>; Gordon, Ben <BGordon@winston.com>; David R. Vance <drv@zrlaw.com>; Patrick J. Hoban <pjh@zrlaw.com>
Subject: Re: Johnson/NFLPA

Thank you.

Stephen

Stephen S. Zashin, Esq.
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On Oct 17, 2018, at 6:56 PM, Greenspan, David <DGreenspan@winston.com> wrote:

We will let you know when our insert is ready tomorrow and we can then simultaneously exchange inserts for the letter. Will aim for 12.

On Oct 17, 2018, at 5:26 PM, Stephen S. Zashin <ssz@zrlaw.com<<mailto:ssz@zrlaw.com>>>>
wrote:

David:

In response to your question, Johnson proposes that the Court issue a scheduling order addressing initial disclosures, other discovery, dispositive motions, and trial. Johnson also intends to file a jury demand regarding his LMRDA claim.

Please provide us with your submission for the Court by noon tomorrow so that we can assemble it in a joint letter. Thank you for anticipated cooperation.

Stephen

[Zashin & Rich]

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Linked In]

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From: Greenspan, David [<mailto:DGreenspan@winston.com>]
Sent: Wednesday, October 17, 2018 10:34 AM
To: Stephen S. Zashin; Kessler, Jeffrey L.; Amoona, Jonathan; Mercier-Dalphon, Isabelle; Gordon, Ben
Cc: David R. Vance; Patrick J. Hoban
Subject: RE: Johnson/NFLPA

Sorry to hear that is the player's position. OK, we will put something together. What will Mr. Johnson propose as the next steps in the litigation so that the NFLPA can respond accordingly? My letter addressed the NFLPA's position on next steps in the event Mr. Johnson disagreed with our position on mootness. Thanks.

From: Stephen S. Zashin [<mailto:ssz@zrlaw.com>]
Sent: Wednesday, October 17, 2018 10:29 AM
To: Greenspan, David <DGreenspan@winston.com<<mailto:DGreenspan@winston.com>>>; Kessler, Jeffrey L. <JKessler@winston.com<<mailto:JKessler@winston.com>>>; Amoona, Jonathan <JAmoona@winston.com<<mailto:JAmoona@winston.com>>>; Mercier-Dalphon, Isabelle <IMercier@winston.com<<mailto:IMercier@winston.com>>>; Gordon, Ben <BGordon@winston.com<<mailto:BGordon@winston.com>>>
Cc: David R. Vance <drv@zrlaw.com<<mailto:drv@zrlaw.com>>>; Patrick J. Hoban <pjh@zrlaw.com<<mailto:pjh@zrlaw.com>>>
Subject: Re: Johnson/NFLPA

David:

Thanks for your letter. Johnson disagrees that the NFLPA has provided a complete copy of the applicable CBA and the NFLPA can moot his claims at this stage of the litigation. Rather, Johnson intends on seeking a jury trial and all damages (economic, non-economic and punitive) and attorneys' fees as provided for by the LMRDA. As a result, please provide your paragraph(s) to Judge Sullivan to us by noon tomorrow. We will incorporate the NFL's position and the NFLPA's position with Johnson's position in a joint letter as required by the Court.

Thanks.

Stephen
[Zashin & Rich]

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From: "dgreenspan@winston.com<<mailto:dgreenspan@winston.com>>"
<dgreenspan@winston.com<<mailto:dgreenspan@winston.com>>>
Date: Tuesday, October 16, 2018 at 6:43 PM
To: Stephen Zashin <ssz@zrlaw.com<<mailto:ssz@zrlaw.com>>>, Jeffrey Kessler

<JKessler@winston.com<mailto:JKessler@winston.com>>, Jonathan Amoona
<JAmoona@winston.com<mailto:JAmoona@winston.com>>, Isabelle Mercier-Dalphon
<IMercier@winston.com<mailto:IMercier@winston.com>>, "Gordon, Ben"
<BGordon@winston.com<mailto:BGordon@winston.com>>
Cc: David Vance <drv@zrlaw.com<mailto:drv@zrlaw.com>>, Patrick Hoban
<pjh@zrlaw.com<mailto:pjh@zrlaw.com>>
Subject: RE: Johnson/NFLPA

Stephen—

A letter (and enclosures) setting forth the NFLPA's position is attached. Once you have had a chance to review, please let us know how you would like to proceed from here.

Thanks.

From: Greenspan, David
Sent: Tuesday, October 16, 2018 11:26 AM
To: 'Stephen S. Zashin' <ssz@zrlaw.com<mailto:ssz@zrlaw.com>>; Kessler, Jeffrey L.
<JKessler@winston.com<mailto:JKessler@winston.com>>; Amoona, Jonathan
<JAmoona@winston.com<mailto:JAmoona@winston.com>>; Mercier-Dalphon, Isabelle
<IMercier@winston.com<mailto:IMercier@winston.com>>
Cc: David R. Vance <drv@zrlaw.com<mailto:drv@zrlaw.com>>; Patrick J. Hoban
<pjh@zrlaw.com<mailto:pjh@zrlaw.com>>
Subject: RE: Johnson/NFLPA

We will send you a letter setting forth the NFLPA's position today. Thanks.

From: Stephen S. Zashin [mailto:ssz@zrlaw.com]
Sent: Tuesday, October 16, 2018 11:25 AM
To: Kessler, Jeffrey L. <JKessler@winston.com<mailto:JKessler@winston.com>>; Amoona,
Jonathan <JAmoona@winston.com<mailto:JAmoona@winston.com>>; Mercier-Dalphon,
Isabelle <IMercier@winston.com<mailto:IMercier@winston.com>>; Greenspan, David
<DGreenspan@winston.com<mailto:DGreenspan@winston.com>>
Cc: David R. Vance <drv@zrlaw.com<mailto:drv@zrlaw.com>>; Patrick J. Hoban
<pjh@zrlaw.com<mailto:pjh@zrlaw.com>>
Subject: Johnson/NFLPA

All:

We have consulted with the NFL and are putting together a joint letter per Judge Sullivan's order. Please provide us with a paragraph concerning the NFLPA's position in the above referenced matter or let us know if you would like to have a phone call prior to Thursday. Given Thursday's deadline, please provide us with the courtesy of a response no later than 5pm today.

Stephen

[Zashin & Rich]

Stephen S. Zashin
OSBA Certified Specialist

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<<https://na01.safelinks.protection.outlook.com/?url=https%3A%2F%2Ftwitter.com%2FZashinRich&data=02%7C01%7CDGreenspan%40winston.com%7Cc567c94c3b844cf4c44008d634773151%7C12a8aae45e2f4ad8adab9375a84aa3e5%7C0%7C0%7C636754083874880684&sdata=Ag%2B8Ld%2BByXclsJ13IHWD%2FIRtUqbB8NkPwELOm3sAlyDM%3D&reserved=0>> | [Zashin & Rich on Linked In]
<<https://na01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.linkedin.com%2Fcompany%2Fzashin-%26-rich-co.-l.p.a.&data=02%7C01%7CDGreenspan%40winston.com%7Cc567c94c3b844cf4c44008d634773151%7C12a8aae45e2f4ad8adab9375a84aa3e5%7C0%7C0%7C636754083874880684&sdata=NcdAGlcwB748jFCShakJaWx7MGoQnJzxIDWtucfhwyA%3D&reserved=0>>

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David R. Vance

From: David R. Vance
Sent: Thursday, October 18, 2018 4:08 PM
To: 'Mercier-Dalphond, Isabelle'; Stephen S. Zashin; Greenspan, David
Cc: Kessler, Jeffrey L.; Amoona, Jonathan; Gordon, Ben; Patrick J. Hoban
Subject: RE: Johnson/NFLPA

Isabelle,

As a follow-up to Stephen's email below, and as you know, the joint letter to the court is due today. The only portion of the letter outstanding is the NFLPA's portion, which you previously stated would be done "around noon" today. It is now after 4:00 p.m. Absent a response from the NFLPA, at 4:45 p.m., we intend to file the letter on behalf of Mr. Johnson and the NFL Defendants indicating that the NFLPA will file its own separate position.

Best,
David






ZASHIN & RICH

David R. Vance
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From: Mercier-Dalphond, Isabelle [mailto:IMercier@winston.com]
Sent: Thursday, October 18, 2018 11:59 AM
To: Stephen S. Zashin; Greenspan, David
Cc: Kessler, Jeffrey L.; Amoona, Jonathan; Gordon, Ben; David R. Vance; Patrick J. Hoban
Subject: RE: Johnson/NFLPA

Stephen,

We are prepared to send you the NFLPA's insert around noon, but wanted to confirm that, as stated in David's email below, you will simultaneously send us Johnson's insert. We also want to confirm that, after we simultaneously exchange our inserts, both sides have a period of time to adjust their respective inserts based on the other side's submission prior to filing. Let us know if you agree with the foregoing.

Best,

Isabelle

Isabelle Mercier-Dalphon

Winston & Strawn LLP

D: +1 (212) 294-3554

winston.com



From: Stephen S. Zashin <ssz@zrlaw.com>

Sent: Wednesday, October 17, 2018 7:37 PM

To: Greenspan, David <DGreenspan@winston.com>

Cc: Kessler, Jeffrey L. <JKessler@winston.com>; Amoona, Jonathan <JAmoona@winston.com>; Mercier-Dalphon, Isabelle <IMercier@winston.com>; Gordon, Ben <BGordon@winston.com>; David R. Vance <drv@zrlaw.com>; Patrick J. Hoban <pjh@zrlaw.com>

Subject: Re: Johnson/NFLPA

Thank you.

Stephen

Stephen S. Zashin, Esq.
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www.zrlaw.com

On Oct 17, 2018, at 6:56 PM, Greenspan, David <DGreenspan@winston.com> wrote:

We will let you know when our insert is ready tomorrow and we can then simultaneously exchange inserts for the letter. Will aim for 12.

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In response to your question, Johnson proposes that the Court issue a scheduling order addressing initial disclosures, other discovery, dispositive motions, and trial. Johnson also intends to file a jury demand regarding his LMRDA claim.

Please provide us with your submission for the Court by noon tomorrow so that we can assemble it in a joint letter. Thank you for anticipated cooperation.

Stephen

[Zashin & Rich]

Stephen S. Zashin
OSBA Certified Specialist
Labor & Employment Law

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From: Greenspan, David [<mailto:DGreenspan@winston.com>]
Sent: Wednesday, October 17, 2018 10:34 AM
To: Stephen S. Zashin; Kessler, Jeffrey L.; Amoona, Jonathan; Mercier-Dalphon, Isabelle;

Gordon, Ben

Cc: David R. Vance; Patrick J. Hoban

Subject: RE: Johnson/NFLPA

Sorry to hear that is the player's position. OK, we will put something together. What will Mr. Johnson propose as the next steps in the litigation so that the NFLPA can respond accordingly? My letter addressed the NFLPA's position on next steps in the event Mr. Johnson disagreed with our position on mootness. Thanks.

From: Stephen S. Zashin [mailto:ssz@zrlaw.com]

Sent: Wednesday, October 17, 2018 10:29 AM

To: Greenspan, David <DGreenspan@winston.com<mailto:DGreenspan@winston.com>>; Kessler, Jeffrey L. <JKessler@winston.com<mailto:JKessler@winston.com>>; Amoona, Jonathan <JAmoona@winston.com<mailto:JAmoona@winston.com>>; Mercier-Dalphon, Isabelle <IMercier@winston.com<mailto:IMercier@winston.com>>; Gordon, Ben <BGordon@winston.com<mailto:BGordon@winston.com>>

Cc: David R. Vance <drv@zrlaw.com<mailto:drv@zrlaw.com>>; Patrick J. Hoban <pjh@zrlaw.com<mailto:pjh@zrlaw.com>>

Subject: Re: Johnson/NFLPA

David:

Thanks for your letter. Johnson disagrees that the NFLPA has provided a complete copy of the applicable CBA and the NFLPA can moot his claims at this stage of the litigation. Rather, Johnson intends on seeking a jury trial and all damages (economic, non-economic and punitive) and attorneys' fees as provided for by the LMRDA. As a result, please provide your paragraph(s) to Judge Sullivan to us by noon tomorrow. We will incorporate the NFL's position and the NFLPA's position with Johnson's position in a joint letter as required by the Court.

Thanks.

Stephen

[Zashin & Rich]

Stephen S. Zashin

OSBA Certified Specialist

Labor & Employment Law

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From: "dgreenspan@winston.com<mailto:dgreenspan@winston.com>"

<dgreenspan@winston.com<mailto:dgreenspan@winston.com>>

Date: Tuesday, October 16, 2018 at 6:43 PM

To: Stephen Zashin <ssz@zrlaw.com<mailto:ssz@zrlaw.com>>, Jeffrey Kessler

<JKessler@winston.com<mailto:JKessler@winston.com>>, Jonathan Amoona

<JAmoona@winston.com<mailto:JAmoona@winston.com>>, Isabelle Mercier-Dalphon

<IMercier@winston.com<mailto:IMercier@winston.com>>, "Gordon, Ben"

<BGordon@winston.com<mailto:BGordon@winston.com>>

Cc: David Vance <drv@zrlaw.com<mailto:drv@zrlaw.com>>, Patrick Hoban

<pjh@zrlaw.com<mailto:pjh@zrlaw.com>>

Subject: RE: Johnson/NFLPA

Stephen—

A letter (and enclosures) setting forth the NFLPA's position is attached. Once you have had a chance to review, please let us know how you would like to proceed from here.

Thanks.

From: Greenspan, David

Sent: Tuesday, October 16, 2018 11:26 AM

To: 'Stephen S. Zashin' <ssz@zrlaw.com<mailto:ssz@zrlaw.com>>; Kessler, Jeffrey L.

<JKessler@winston.com<mailto:JKessler@winston.com>>; Amoona, Jonathan
<JAmoona@winston.com<mailto:JAmoona@winston.com>>; Mercier-Dalphon, Isabelle
<IMercier@winston.com<mailto:IMercier@winston.com>>
Cc: David R. Vance <drv@zrlaw.com<mailto:drv@zrlaw.com>>; Patrick J. Hoban
<pjh@zrlaw.com<mailto:pjh@zrlaw.com>>
Subject: RE: Johnson/NFLPA

We will send you a letter setting forth the NFLPA's position today. Thanks.

From: Stephen S. Zashin [mailto:ssz@zrlaw.com]
Sent: Tuesday, October 16, 2018 11:25 AM
To: Kessler, Jeffrey L. <JKessler@winston.com<mailto:JKessler@winston.com>>; Amoona, Jonathan <JAmoona@winston.com<mailto:JAmoona@winston.com>>; Mercier-Dalphon, Isabelle <IMercier@winston.com<mailto:IMercier@winston.com>>; Greenspan, David <DGreenspan@winston.com<mailto:DGreenspan@winston.com>>
Cc: David R. Vance <drv@zrlaw.com<mailto:drv@zrlaw.com>>; Patrick J. Hoban <pjh@zrlaw.com<mailto:pjh@zrlaw.com>>
Subject: Johnson/NFLPA

All:

We have consulted with the NFL and are putting together a joint letter per Judge Sullivan's order. Please provide us with a paragraph concerning the NFLPA's position in the above referenced matter or let us know if you would like to have a phone call prior to Thursday. Given Thursday's deadline, please provide us with the courtesy of a response no later than 5pm today.

Stephen

[Zashin & Rich]

Stephen S. Zashin
OSBA Certified Specialist
Labor & Employment Law

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Lyv48ozfg1y%2B2dFCrTCBnNG4Ywp3ij3Xylz5fwY%3D&reserved=0> | [Zashin & Rich on Facebook]

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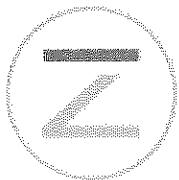
David R. Vance

From: Stephen S. Zashin
Sent: Thursday, October 18, 2018 12:09 PM
To: Mercier-Dalphon, Isabelle; Greenspan, David
Cc: Kessler, Jeffrey L.; Amoona, Jonathan; Gordon, Ben; David R. Vance; Patrick J. Hoban
Subject: RE: Johnson/NFLPA

Isabelle:

We have no issue doing a simultaneous exchange of positions. We have already shared with the NFLPA our general thoughts as to next steps. At this point, Johnson's position is his position and the NFLPA's position is its position. Once exchanged, these positions should go into the letter to Judge Sullivan without edits. Please confirm what time you will send the NFLPA's submission and we will do likewise. Thereafter, we will drop the NFLPA's position into the letter and file it with the Court. Thanks.

Stephen



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Best,

Isabelle

Isabelle Mercier-Dalphon

Winston & Strawn LLP

D: +1 (212) 294-3554

winston.com

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& STRAWN**
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From: Stephen S. Zashin <ssz@zrlaw.com>

Sent: Wednesday, October 17, 2018 7:37 PM

To: Greenspan, David <DGreenspan@winston.com>

Cc: Kessler, Jeffrey L. <JKessler@winston.com>; Amoona, Jonathan <JAmoona@winston.com>; Mercier-Dalphon, Isabelle <IMercier@winston.com>; Gordon, Ben <BGordon@winston.com>; David R. Vance <drv@zrlaw.com>; Patrick J. Hoban <pjh@zrlaw.com>

Subject: Re: Johnson/NFLPA

Thank you.

Stephen

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David:

In response to your question, Johnson proposes that the Court issue a scheduling order addressing initial disclosures, other discovery, dispositive motions, and trial. Johnson also intends to file a jury demand regarding his LMRDA claim.

Please provide us with your submission for the Court by noon tomorrow so that we can assemble it in a joint letter. Thank you for anticipated cooperation.

Stephen

[Zashin & Rich]

Stephen S. Zashin
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From: Greenspan, David [mailto:DGreenspan@winston.com]
Sent: Wednesday, October 17, 2018 10:34 AM

To: Stephen S. Zashin; Kessler, Jeffrey L.; Amoona, Jonathan; Mercier-Dalphon, Isabelle; Gordon, Ben
Cc: David R. Vance; Patrick J. Hoban
Subject: RE: Johnson/NFLPA

Sorry to hear that is the player's position. OK, we will put something together. What will Mr. Johnson propose as the next steps in the litigation so that the NFLPA can respond accordingly? My letter addressed the NFLPA's position on next steps in the event Mr. Johnson disagreed with our position on mootness. Thanks.

From: Stephen S. Zashin [mailto:ssz@zrlaw.com]
Sent: Wednesday, October 17, 2018 10:29 AM
To: Greenspan, David <DGreenspan@winston.com<mailto:DGreenspan@winston.com>>; Kessler, Jeffrey L. <JKessler@winston.com<mailto:JKessler@winston.com>>; Amoona, Jonathan <JAmoona@winston.com<mailto:JAmoona@winston.com>>; Mercier-Dalphon, Isabelle <IMercier@winston.com<mailto:IMercier@winston.com>>; Gordon, Ben <BGordon@winston.com<mailto:BGordon@winston.com>>
Cc: David R. Vance <drv@zrlaw.com<mailto:drv@zrlaw.com>>; Patrick J. Hoban <pjh@zrlaw.com<mailto:pjh@zrlaw.com>>
Subject: Re: Johnson/NFLPA

David:

Thanks for your letter. Johnson disagrees that the NFLPA has provided a complete copy of the applicable CBA and the NFLPA can moot his claims at this stage of the litigation. Rather, Johnson intends on seeking a jury trial and all damages (economic, non-economic and punitive) and attorneys' fees as provided for by the LMRDA. As a result, please provide your paragraph(s) to Judge Sullivan to us by noon tomorrow. We will incorporate the NFL's position and the NFLPA's position with Johnson's position in a joint letter as required by the Court.

Thanks.

Stephen
[Zashin & Rich]

Stephen S. Zashin
OSBA Certified Specialist
Labor & Employment Law

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From: "dgreenspan@winston.com<<mailto:dgreenspan@winston.com>>"

<dgreenspan@winston.com<<mailto:dgreenspan@winston.com>>>

Date: Tuesday, October 16, 2018 at 6:43 PM

To: Stephen Zashin <ssz@zrlaw.com<<mailto:ssz@zrlaw.com>>>, Jeffrey Kessler

<JKessler@winston.com<<mailto:JKessler@winston.com>>>, Jonathan Amoona

<JAmoona@winston.com<<mailto:JAmoona@winston.com>>>, Isabelle Mercier-Dalphon

<IMercier@winston.com<<mailto:IMercier@winston.com>>>, "Gordon, Ben"

<BGordon@winston.com<<mailto:BGordon@winston.com>>>

Cc: David Vance <drv@zrlaw.com<<mailto:drv@zrlaw.com>>>, Patrick Hoban

<pjh@zrlaw.com<<mailto:pjh@zrlaw.com>>>

Subject: RE: Johnson/NFLPA

Stephen—

A letter (and enclosures) setting forth the NFLPA's position is attached. Once you have had a chance to review, please let us know how you would like to proceed from here.

Thanks.

From: Greenspan, David

Sent: Tuesday, October 16, 2018 11:26 AM

To: 'Stephen S. Zashin' <ssz@zrlaw.com<mailto:ssz@zrlaw.com>>; Kessler, Jeffrey L. <JKessler@winston.com<mailto:JKessler@winston.com>>; Amoona, Jonathan <JAmoona@winston.com<mailto:JAmoona@winston.com>>; Mercier-Dalphon, Isabelle <IMercier@winston.com<mailto:IMercier@winston.com>>
Cc: David R. Vance <drv@zrlaw.com<mailto:drv@zrlaw.com>>; Patrick J. Hoban <pjh@zrlaw.com<mailto:pjh@zrlaw.com>>
Subject: RE: Johnson/NFLPA

We will send you a letter setting forth the NFLPA's position today. Thanks.

From: Stephen S. Zashin [mailto:ssz@zrlaw.com]
Sent: Tuesday, October 16, 2018 11:25 AM
To: Kessler, Jeffrey L. <JKessler@winston.com<mailto:JKessler@winston.com>>; Amoona, Jonathan <JAmoona@winston.com<mailto:JAmoona@winston.com>>; Mercier-Dalphon, Isabelle <IMercier@winston.com<mailto:IMercier@winston.com>>; Greenspan, David <DGreenspan@winston.com<mailto:DGreenspan@winston.com>>
Cc: David R. Vance <drv@zrlaw.com<mailto:drv@zrlaw.com>>; Patrick J. Hoban <pjh@zrlaw.com<mailto:pjh@zrlaw.com>>
Subject: Johnson/NFLPA

All:

We have consulted with the NFL and are putting together a joint letter per Judge Sullivan's order. Please provide us with a paragraph concerning the NFLPA's position in the above referenced matter or let us know if you would like to have a phone call prior to Thursday. Given Thursday's deadline, please provide us with the courtesy of a response no later than 5pm today.

Stephen

[Zashin & Rich]

Stephen S. Zashin
OSBA Certified Specialist
Labor & Employment Law

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